



**Air Quality**  
**PERMIT TO CONSTRUCT**  
**State of Idaho**  
**Department of Environmental Quality**

**PERMIT No.:** P- 060209

**FACILITY ID No.:** 069-00001

**AQCR:** 62

**CLASS:** A

**SIC:** 2611

**ZONE:** 11

**UTM COORDINATE (km):** 501.9, 5141.3

**1. PERMITTEE**

Potlatch Forest Products Corp., Idaho Pulp and Paperboard Division, Lewiston facility

**2. PROJECT**

Permit to Construct (PTC) revision

**3. MAILING ADDRESS**

P.O. Box 1126

**CITY**

Lewiston

**STATE**

ID

**ZIP**

83501-1126

**4. FACILITY CONTACT**

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**TITLE**

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**6. EXACT PLANT LOCATION**

803 Mill Road, Lewiston, Idaho

**COUNTY**

Nez Perce

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Pulp and paperboard manufacturing

**8. GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

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SHAWNEE CHEN, P.E., PERMIT WRITER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

\_\_\_\_\_  
MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:**

**DRAFT FOR PUBLIC  
COMMENT**

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## Acronyms, Units, and Chemical Nomenclature

ADP	air dried pulp
ADTUBP/hr	air dried ton unbleached pulp per hour
AQCR	Air Quality Control Region
CAM	Compliance assurance monitoring
CFR	Code of Federal Regulations
CEMS	continuous emissions monitoring system
CMS	continuous monitoring system
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
ESP	electrostatic precipitator
gpm	gallons per minute
HAP	hazardous air pollutant
HVLC	high volume, low concentration
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
LVHC	low volume, high concentration
MACT	Maximum Achievable Control Technology
NAAQS	national ambient air quality standard
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
ODP	oven-dried pulp
OP	operating permit
Potlatch	Potlatch Forest Products Corp., Idaho Pulp and Paperboard Division, Lewiston facility
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
QIP	Quality Improvement Plan
SIC	Standard Industrial Classification
SO <sub>2</sub>	sulfur dioxide
RA	relative accuracy
RATA	relative accuracy test audit
TRS	Total reduced sulfur
T/yr	tons per year
UTM	Universal Transverse Mercator

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### 1. PERMIT TO CONSTRUCT SCOPE

#### *Purpose*

- 1.1** This permit revision uses the revision to the PTC for noncondensable gas incinerator issued August 29, 1997 as a vehicle to consolidate the related MACT, NSPS, CAM and IDAPA requirements applying to noncondensable gas emissions from low volume, high concentration (LVHC) system into one single PTC.

Noncondensable gases are also called LVHC gases.

It is important to point out:

- Though while lime kilns are used to control LVHC gas emissions from the LVHC system, they are also function as emissions units. The lime kilns are regulated in a separate PTC, and are not included in this permit.
- The Chip PreOx Brownstock Washers are subject to 40 CFR 60 subpart BB. They send high volume, low concentration (HVLC) gases to either No. 3 or No. 4 lime kiln. Since this permit only regulates LVHC gas emissions, the Pre Ox Brownstock washers are not included in this permit.

[DRAFT]

- 1.2** This PTC replaces the PTC for noncondensable gas incinerator, issued August 29, 1997, the terms and conditions of which shall no longer apply.

#### *Regulated Sources*

Table 1.1 lists all sources of regulated emissions in this PTC.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

Permit Section	Source Description	Emissions Control(s) <sup>a</sup>
2	12 batch digesters, No. 1 and No. 2 M&D digesters, multiple-effect evaporator system, turpentine system, and foul condensate collection tank.	Incinerator with the SO <sub>2</sub> packed bed scrubber, backed up by No.4 lime kiln with electrostatic precipitator (ESP) and the SO <sub>2</sub> packed bed scrubber, and then backed up by No.3 lime kiln with ESP

- a. While lime kilns are used to control LVHC emissions, they are also function as emissions units. The kilns are used to produce calcium oxide. They emit particulate matters, and air pollutants from combustion. The lime kilns are regulated in a separate PTC, and are not included in this permit.

[DRAFT]

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**2. TWELVE BATCH DIGESTERS, NO. 1 AND NO. 2 M&D CONTINUOUS DIGESTERS, MULTIPLE-EFFECT EVAPORATOR SYSTEM, TURPENTINE SYSTEM, AND FOUL CONDENSATE COLLECTION TANK**

**2.1 Process Description**

LVHC system is defined in 40 CFR 63.441 as the collection of equipment including the digester, turpentine recovery, evaporator, steam stripper systems, and any other equipment serving the same function as those previously listed.

At Potlatch, 12 batch digesters, No. 1 and No. 2 M&D continuous digesters, the multiple-effect evaporator system, turpentine system, and foul condensate collection tank are, all together, called LVHC system. The LVHC system produces pulp, processes pulping liquors, and generates LVHC gases.

[DRAFT]

**2.2 Emissions Control Description**

In accordance with 40 CFR 63.443, the emissions from LVHC system shall be enclosed and vented into a closed-vent system and routed to a control device that meets the requirements specified in 40 CFR 63.443(d). The enclosures and closed-vent system shall meet the requirements specified in 40 CFR 63.450.

Potlatch uses the control devices specified in the following table.

**Table 2.1 LVHC SYSTEM DESCRIPTION**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
LVHC system	Incinerator with the SO <sub>2</sub> packed bed scrubber, backed up by	Incinerator stack (also called scrubber stack)
	No.4 lime kiln with ESP and the SO <sub>2</sub> packed bed scrubber, backed up by	No.4 lime kiln scrubber stack
	No.3 lime kiln with ESP	No.3 lime kiln ESP stack

[DRAFT]

***Requirements for LVHC gas emissions from LVHC system taken from 40 CFR 63 Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry***

**2.3 General Requirement**

The permittee shall comply with 40 CFR 63, Subpart S. The following permit conditions 2.4 to 2.12 apply to LVHC gas emissions from LVHC system. Should, there be a conflict between 40 CFR 63 Subpart S and Permit Conditions 2.4 to 2.12, requirements in 40 CFR 63, Subpart S shall govern.

The permittee shall comply with General Provisions of 40 CFR 63 as specified in Table 1 of 40 CFR 63 Subpart S.

[DRAFT, 40 CFR 63 Subpart S]

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**2.4     40 CFR 63.443(a)(1)(i) - Control HAP Emissions**

The total HAP emissions from Each LVHC system shall be controlled.

[DRAFT, 40 CFR 63.443(a)(1)(i)]

**2.5     40 CFR 63.443(c) - Enclose, Vent and Route Emissions**

Each LVHC system emissions shall be enclosed and vented into a closed-vent system and routed to a control device that meets the requirements specified in 40 CFR 63.443(d). The enclosures and closed-vent system shall meet the requirements specified in 40 CFR 63.450.

[DRAFT, 40 CFR 63.443(c)]

**2.6     40 CFR 63.443(d) - Control Device**

The control device used to reduce total HAP emissions from each LVHC system, shall:

- (1) Reduce total HAP emissions by 98 percent or more by weight; or
- (2) Reduce the total HAP concentration at the outlet of the thermal oxidizer to 20 parts per million or less by volume, corrected to 10 percent oxygen on a dry basis; or
- (3) Reduce total HAP emissions using a thermal oxidizer designed and operated at a minimum temperature of 871 °C (1600 °F) and a minimum residence time of 0.75 seconds; or
- (4) Reduce total HAP emissions using one of the following:
  - (i) A boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone; or
  - (ii) A boiler or recovery furnace with a heat input capacity greater than or equal to 44 megawatts (150 million British thermal units per hour) by introducing the HAP emission stream with the combustion air.

[DRAFT, 40 CFR 63.443(d)]

**2.7     40 CFR 63.443(e) – What is Not a Violation of 40 CFR 63.443(c) and (d)**

Periods of excess emissions reported under 40 CFR63.455 shall not be a violation of 40 CFR63.443(c) and (d) provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed the following levels:

- (1) One percent for control devices used to reduce the total HAP emissions from the LVHC system; and
- (2) Does not apply to LVHC system.
- (3) Four percent for control devices used to reduce the total HAP emissions from both the LVHC and HVLC systems.

[DRAFT, 40 CFR 63.443(e)]

**2.8     40 CFR 63.450 – Standards for Enclosures and Closed-vent Systems Described under 40 CFR 63.443(c)**

(a) Each enclosure and closed-vent system specified in 40 CFR 63.443(c) for capturing and transporting vent streams that contain HAP shall meet the requirements specified in 40 CFR 63.450 (b) through (d).

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(b) each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in 40 CFR 63.457(e). Each enclosure or hood opening closed during the initial performance test specified in 40 CFR 63.457(a) shall be maintained in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs.

(c) Each component of the closed-vent system used to comply with 40 CFR 63.443(c) that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in 40 CFR 63.457(d).

(d) Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in 40 CFR 63.443 shall comply with either of the following requirements:

(1) On each bypass line, the owner or operator shall install, calibrate, maintain, and operate according to the manufacturer's specifications a flow indicator that is capable of taking periodic readings as frequently as specified in 40 CFR 63.454(e). The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line; or

(2) For bypass line valves that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal.

**[DRAFT, 40 CFR 63.450]**

**2.9     40 CFR 63.453 – Monitoring Requirements**

(a) Each owner or operator subject to the standards specified in 40 CFR 63.443(c) or 40 CFR 63.450(d), shall install, calibrate, certify, operate, and maintain according to the manufacturer's specifications, a continuous monitoring system (CMS, as defined in 40 CFR 63.2) as specified in paragraphs (b) through (m) of 40 CFR 63.453, except as allowed in paragraph (m) of 40 CFR 63.453. The CMS shall include a continuous recorder.

(b) A CMS shall be operated to measure the temperature in the firebox or in the ductwork immediately downstream of the firebox and before any substantial heat exchange occurs for each thermal oxidizer used to comply with the requirements of 40 CFR 63.443(d)(1) through (d)(3). Owners and operators complying with the HAP concentration requirements in 40 CFR 63.443(d)(2) may install a CMS to monitor the thermal oxidizer outlet total HAP or methanol concentration, as an alternative to monitoring thermal oxidizer operating temperature.

(c) – (j) Do not apply to LVHC system

(k) Each enclosure and closed-vent system used to comply with 40 CFR 63.450(a) shall comply with the requirements specified in paragraphs (k)(1) through (k)(6) of 40 CFR 63.453.

(1) For each enclosure opening, a visual inspection of the closure mechanism specified in 40 CFR 63.450(b) shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed.

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(2) Each closed-vent system required by 40 CFR 63.450(a) shall be visually inspected every 30 days and at other times as requested by the Administrator. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.

(3) For positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in 40 CFR 63.450(c) measured initially and annually by the procedures in 40 CFR 63.457(d).

(4) Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR 63.457(e).

(5) The valve or closure mechanism specified in 40 CFR 63.450(d)(2) shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

(6) If an inspection required by paragraphs (k)(1) through (k)(5) of 40 CFR 63.453 identifies visible defects in ductwork, piping, enclosures or connections to covers required by 40 CFR 63.450, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable.

(i) A first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified.

(ii) The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the owner or operator determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.

(l) Does not apply to LVHC system.

(m) Each owner or operator using a control device, technique or an alternative parameter other than those specified in paragraphs (b) through (l) of 40 CFR 63.453 shall install a CMS and establish appropriate operating parameters to be monitored that demonstrate, to the Administrator's satisfaction, continuous compliance with the applicable control requirements.

(n) To establish or reestablish the value for each operating parameter required to be monitored under paragraphs (b) and (m) of 40 CFR 63.453 or to establish appropriate parameters for paragraphs (m) of 40 CFR 63.453, each owner or operator shall use the following procedures:

(1) During the initial performance test required in 40 CFR 63.457(a) or any subsequent performance test, continuously record the operating parameter;

(2) Determinations shall be based on the control performance and parameter data monitored during the performance test, supplemented if necessary by engineering assessments and the manufacturer's recommendations;



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(3) The owner or operator shall provide for the Administrator's approval the rationale for selecting the monitoring parameters necessary to comply with paragraph (m) of 40 CFR 63.453; and

(4) Provide for the Administrator's approval the rationale for the selected operating parameter value, and monitoring frequency, and averaging time. Include all data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the applicable emission standard.

(o) Each owner or operator of a control device subject to the monitoring provisions of this section shall operate the control device in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under paragraphs (a) through (n) of 40 CFR 63.453 and established under 40 CFR 63 Subpart S. Except as provided in 40 CFR 63.443(e), operation of the control device below minimum operating parameter values or above maximum operating parameter values established under this subpart or failure to perform procedures required by this subpart shall constitute a violation of the applicable emission standard of this subpart and be reported as a period of excess emissions.

**[DRAFT, 40 CFR 63.453]**

**2.10 40 CFR 63.454 – Recordkeeping Requirements**

(a) The owner or operator of each affected source subject to the requirements of this subpart shall comply with the recordkeeping requirements of 40 CFR 63.10, as shown in table 1 of 40 CFR 63 Subpart S, and the requirements specified in paragraphs (b) through (f) of 40 CFR 63.454 for the monitoring parameters specified in 40 CFR 63.453.

(b) For each applicable enclosure opening, closed-vent system, and closed collection system, the owner or operator shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment and shall record the following information for each inspection:

(1) Date of inspection;

(2) The equipment type and identification;

(3) Results of negative pressure tests for enclosures;

(4) Results of leak detection tests;

(5) The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection);

(6) The date the defect or leak was detected and the date of each attempt to repair the defect or leak;

(7) Repair methods applied in each attempt to repair the defect or leak;

(8) The reason for the delay if the defect or leak is not repaired within 15 days after discovery;

(9) The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;

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(10) The date of successful repair of the defect or leak;

(11) The position and duration of opening of bypass line valves and the condition of any valve seals; and

(12) The duration of the use of bypass valves on computer controlled valves.

(c) Does not apply to LVHC system

(d) Does not apply to Potlatch's LVHC system because it is not new affected process equipment at the time of issuing this permit.

(e) Does not apply to LVHC system.

[DRAFT, 40 CFR 63.454]

**2.11    40 CFR 63.455 – Reporting Requirements**

(a) Each owner or operator of a source subject to this subpart shall comply with the reporting requirements of 40 CFR 63 subpart A as specified in table 1 of 40 CFR 63 Subpart S. The initial notification report specified under 40 CFR 63.9(b)(2) shall be submitted by April 15, 1999. This initial notification report was submitted to DEQ on April 14, 1999.

(b) – (f) do not apply to LVHC system.

[DRAFT, 40 CFR 63.455]

**2.12    40 CFR 63.457 – Test Methods and Procedures**

(a) *Initial performance test.* An initial performance test is required for all emission sources subject to the limitations in 40 CFR 63.443, except those controlled by a combustion device that is designed and operated as specified in 40 CFR 63.443(d)(3) or (d)(4).

(b) *Vent sampling port locations and gas stream properties.* For purposes of selecting vent sampling port locations and determining vent gas stream properties, required in 40 CFR 63.443, each owner or operator shall comply with the applicable procedures in paragraphs (b)(1) through (b)(6) of 40 CFR 63.457.

(c) Does not apply to LVHC system.

(d) Detectable leak procedures. To measure detectable leaks for closed-vent systems as specified in 40 CFR 63.450, the owner or operator shall comply with the following:

(1) Method 21, of 40 CFR 60, appendix A; and

(2) The instrument specified in Method 21 shall be calibrated before use according to the procedures specified in Method 21 on each day that leak checks are performed. The following calibration gases shall be used:

(i) Zero air (less than 10 parts per million by volume of hydrocarbon in air); and

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(ii) A mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 parts per million by volume methane or n-hexane.

(e) Negative pressure procedures. To demonstrate negative pressure at process equipment enclosure openings as specified in 40 CFR 63.450(b), the owner or operator shall use one of the following procedures:

- (1) An anemometer to demonstrate flow into the enclosure opening;
- (2) Measure the static pressure across the opening;
- (3) Smoke tubes to demonstrate flow into the enclosure opening; or
- (4) Any other industrial ventilation test method demonstrated to the Administrator's satisfaction.

(f) HAP concentration measurements. For purposes of complying with the requirements in 40 CFR 63.443, the owner or operator shall measure the total HAP concentration as one of the following:

- (1) As the sum of all individual HAPs; or
- (2) As methanol.

(g) and (h) do not apply to LVHC system.

(i) *Vent gas stream calculations.* To demonstrate compliance with the mass emission rate, mass emission rate per megagram of oven-dried pulp (ODP), and percent reduction requirements for vent gas streams specified in 40 CFR 63.443, the owner or operator shall use the following:

(1) The total HAP mass emission rate shall be calculated using the following equation:

$$E = K_2 \left[ \sum_{j=1}^n C_j M_j \right] Q_s$$

Where:

E=Mass emission rate of total HAP from the sampled vent, kilograms per hour.

$K_2$ =Constant,  $2.494 \times 10^{-6}$  (parts per million by volume)<sup>-1</sup> (gram-mole per standard cubic meter) (kilogram/gram) (minutes/hour), where standard temperature for (gram-mole per standard cubic meter) is 20 °C.

$C_j$ =Concentration on a dry basis of pollutant j in parts per million by volume as measured by the test methods specified in paragraph (b) of this section.

$M_j$ =Molecular weight of pollutant j, gram/gram-mole.

$Q_s$ =Vent gas stream flow rate (dry standard cubic meter per minute) at a temperature of 20 °C as indicated in paragraph (b) of this section.

n=Number of individual pollutants, i, summed to calculate total HAP.

(2) The total HAP mass emission rate per megagram of ODP shall be calculated using the following equation:

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$$F = \frac{E}{P}$$

Where:

F=Mass emission rate of total HAP from the sampled vent, in kilograms per megagram of ODP.

E=Mass emission rate of total HAP from the sampled vent, in kilograms per hour determined as specified in paragraph (i)(1) of this section.

P=The production rate of pulp during the sampling period, in megagrams of ODP per hour.

(3) The total HAP percent reduction shall be calculated using the following equation:

$$R = \frac{E_i - E_o}{E_i} (100)$$

Where:

R=Efficiency of control device, percent.

E<sub>i</sub>=Inlet mass emission rate of total HAP from the sampled vent, in kilograms of pollutant per hour, determined as specified in paragraph (i)(1) of this section.

E<sub>o</sub>=Outlet mass emission rate of total HAP from the sampled vent, in kilograms of pollutant per hour, determined as specified in paragraph (i)(1) of this section.

(j) – (n) Do not apply to LVHC system.

[DRAFT, 40 CFR 63.457]

***Requirements for LVHC gas emissions from the multiple-effect evaporator system and the No.9 batch digester taken from 40 CFR 60 Subpart BB - Standards of Performance for Kraft Pulp Mills***

### 2.13 General Requirement

The permittee shall comply with 40 CFR 60, Subpart BB. The following Permit Conditions 2.14 to 2.16 apply to LVHC gas emissions from the multiple-effect evaporator system and No.9 batch digester. Should, there be a conflict between 40 CFR 60 Subpart BB and Permit Conditions 2.14 to 2.16, requirements in 40 CFR 60, Subpart BB shall govern.

The permittee shall comply with applicable General Provisions of 40 CFR 60.

[DRAFT, with 40 CFR 60 Subpart BB]

### 2.14 40 CFR 60.283 - Standard for Total Reduced Sulfur (TRS)

(a) On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere:

(1) From any digester system, or multiple-effect evaporator system any gases which contain TRS in excess of 5 ppm by volume on a dry basis, corrected to 10 percent oxygen, unless the following conditions are met:

(i) and (ii) Do not apply because the lime kilns are not subject to this subpart; and LVHC gases do not route to a recovery furnace at the time of the permit issuance.

(iii) The gases are combusted with other waste gases in an incinerator or other device, or combusted in a lime kiln not subject to the provisions of this subpart, and are subjected to a minimum temperature of 650 °C (1200 °F) for at least 0.5 second; or

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(iv) Do not apply to multiple-effect evaporator system.

(v) The gases from No.9 batch digester is controlled by a means other than combustion. In this case, this system shall not discharge any gases to the atmosphere which contain TRS in excess of 5 ppm by volume on a dry basis, uncorrected for oxygen content.

(vi) The uncontrolled exhaust gases from a new, modified, or reconstructed digester system (i.e., No.9 batch digester) contain TRS less than 0.005 g/kg air dried pulp (ADP) (0.01 lb/ton ADP).

(2) and (3) Do not apply because LVHC gases do not route to a recovery furnace at the time of the permit issuance.

(4) Does not apply to multiple-effect evaporator system and No.9 batch digester.

(5) Does not apply because the lime kilns are not subject to this subpart at the time of the permit issuance.

**[DRAFT, 40 CFR 60.283]**

### **2.15 40 CFR 60.284 - Monitoring of Emissions and Operations**

(a) Does not apply because the permittee has chosen to comply with 40 CFR 60.283(a)(1)(iii).

(b) Any owner or operator subject to the provisions of this subpart shall install, calibrate, maintain, and operate the following continuous monitoring devices:

(1) For any incinerator, a monitoring device which measures and records the combustion temperature at the point of incineration of effluent gases which are emitted from multiple-effect evaporator system, or No.9 batch digester where the provisions of 40 CFR 60.283(a)(1)(iii) apply. The monitoring device is to be certified by the manufacturer to be accurate within  $\pm 1$  percent of the temperature being measured.

(2) Does not apply because the lime kilns are not subject to this subpart at the time of the permit issuance.

(c) Does not apply because the permittee has chosen to comply with 40 CFR 60.283(a)(1)(iii).

(d) For the purpose of reports required under 40 CFR 60.7(c), any owner or operator subject to the provisions of 40 CFR 60 Subpart BB shall report semiannually periods of excess emissions as follows:

(1) and (2) Do not apply to multiple-effect evaporator system.

(3) For emissions from any multiple-effect evaporator system, or No.9 batch digester periods of excess emissions are:

(i) Does not apply because the provisions of 40 CFR 60.283(a)(1) (i), (ii), or (iv) do not apply at the time of permit issuance.

(ii) All periods in excess of 5 minutes and their duration during which the combustion temperature at the point of incineration is less than 650 °C (1200 °F), where the provisions of §60.283(a)(1)(iii) apply.

(e) The Administrator will not consider periods of excess emissions reported under paragraph (d) of this section to be indicative of a violation of 40 CFR 60.11(d) provided that:

(1) Does not apply to multiple-effect evaporator system, or No.9 batch digester.

(2) The Administrator determines that the affected facility, including air pollution control equipment, is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions.

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(f) Does not apply because a continuous emissions monitoring system is not required when the permittee complies with 60.283(a)(1)(iii). Performance specification 1, 3, and 5 of appendix B of 40 CFR 60 are for emissions monitors, not for a temperature monitor.

**[DRAFT, 40 CFR 60.284]**

**2.16    40 CFR 60.285 – Test Methods and Procedures**

(a) In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures in this section, except as provided in 40 CFR 60.8(b). Acceptable alternative methods and procedures are given in paragraph (f) of 40 CFR 60.285

(b) and (c) Do not apply.

(d) The owner or operator shall determine compliance with the TRS standards in 40 CFR 60.283, except 40 CFR 60.283(a)(1)(vi) and (4), as follows:

(1) Method 16 shall be used to determine the TRS concentration. The TRS concentration shall be corrected to the appropriate oxygen concentration using the procedure in 40 CFR 60.284(c)(3). The sampling time shall be at least 3 hours, but no longer than 6 hours.

(2) The emission rate correction factor, integrated sampling and analysis procedure of Method 3B shall be used to determine the oxygen concentration. The sample shall be taken over the same time period as the TRS samples.

(3) Does not apply.

(e) Does not apply.

(f) The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:

(1) Does not apply.

(2) In place of Method 16, Method 16A or 16B may be used.

**[DRAFT, 40 CFR 60.285]**

***Requirements for LVHC gas emissions taken from IDAPA58.01.01.815-826 – Rules for Control of Kraft Pulp Mill***

**2.17    General Requirement**

The permittee shall comply with IDAPA58.01.01.815-826. The following permit conditions 2.18 and 2.19 apply to LVHC gas emissions from the multiple-effect evaporator system. Should, there be a conflict between IDAPA58.01.01.815-826, and permit conditions 2.18 and 2.19, requirements in IDAPA58.01.01.815-826 shall govern.

**[DRAFT, IDAPA58.01.01.815-826]**

**2.18    IDAPA58.01.01.820 - Digester and Evaporator Standards**

Noncondensibles (also called LVHC) gases from digesters and multiple-effect evaporators shall be treated to reduce the emission of TRS equal to the reduction achieved by thermal oxidation in a lime kiln. Compliance with this requirement shall be achieved by not later than July, 1972.

**[DRAFT, IDAPA58.01.01.820]**

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**2.19 IDAPA58.01.01.824 -Monitoring and Reporting**

**05 Semi-Annual Reporting Requirements**

Unless otherwise authorized by the Department, excess emissions data for emissions units covered by IDAPA58.01.01.820 shall be reported by each mill at the end of each semi-annual calendar period, as follows:

- a. Excess emissions for the semi-annual report required by IDAPA 58.01.01.824.05 shall be defined as periods during which noncondensibles are not treated as required by IDAPA58.01.01.820. Periods of excess emissions reported under IDAPA 58.01.01.824.05 shall not be a violation under IDAPA 58.01.01.820 provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual period does not exceed one percent (1%).
- b. The total duration of excess emissions during the reporting period (recorded in hours).
- c. The total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and
- d. A breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

[DRAFT, IDAPA58.01.01.824]

***Emissions Limits***

**2.20 SO<sub>2</sub> Emissions Limits –to avoid significant modification to a major source (PSD, or 40 CFR 52.21)**

- The SO<sub>2</sub> emissions from the stack of the packed bed scrubber (also called incinerator stack) shall not exceed 4.70 lb/hr, based on a three-hour average.
- The SO<sub>2</sub>, emissions from the stack of the packed bed scrubber (also called incinerator stack) shall not exceed 20 T/yr, based on a 12-month rolling average.

[August 29, 1997]

**2.21 Visible Emissions**

The permittee shall comply with visible emissions requirements as specified in facility's Tier I operating permit.

[DRAFT, IDAPA 58.01.01.625]

***Operating Requirements***

**2.22 SO<sub>2</sub> Packed Bed Scrubber Operation**

The packed bed scrubber shall be installed, operated and maintained according to the manufacturer's recommendations. The packed bed scrubber may be operated according to site specific values developed under Permit Condition 2.26.

[Draft, August 29, 1997]

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**2.23 Stop SO<sub>2</sub> CEMS Operation**

The permittee is not required to comply with CAM requirements (i.e., Permit Conditions 2.26 to 2.30) until its regulatory deadline defined in 40 CFR 64 unless the permittee opt to stop using SO<sub>2</sub> CEM.

The permittee may stop using SO<sub>2</sub> CEMS (i.e., stop complying with Permit Conditions 2.31 to 2.35) when the permittee is in compliance with CAM requirements (i.e., Permit Conditions 2.26 to 2.30).

Prior to stopping using SO<sub>2</sub> CEMS, the permittee shall submit information demonstrating compliance with Permit Conditions 2.26 and 2.27 to DEQ. DEQ shall send written notice to the permittee of whether requirements in Permit Conditions 2.26 and 2.27 are met within 30 days of receiving the request of stopping using SO<sub>2</sub> CEM from the permittee. If DEQ fails to send the written notice to the permittee within 30 day of receipt, the permission of stopping using SO<sub>2</sub> CEMS deemed to be granted.

**[DRAFT]**

***40 CFR 64 - Compliance Assurance Monitoring for SO<sub>2</sub> Emissions Limits***

**2.24 General Requirement**

The permittee shall comply with Permit Conditions 2.25 to 2.30 developed based on, or taken from 40 CFR 64 for SO<sub>2</sub> emissions limits of the packed bed scrubber stack (also called incinerator stack). The SO<sub>2</sub> emissions from the packed bed scrubber are due to the SO<sub>2</sub> emissions from the incinerator when the incinerator oxidizes the TRS in the LVHC gases from the LVHC system.

Should, there be a conflict between 40 CFR 64 and Permit Conditions 2.25 to 2.30, requirements in 40 CFR 64 shall govern.

**[DRAFT, 40 CFR 64]**

**2.25 40 CFR 64.3 - Monitoring Design Criteria**

The permittee shall design the monitoring in accordance with 40 CFR 64.3.

**[DRAFT, 40 CFR 64.3]**

***Monitoring and Recordkeeping Requirements***

**2.26 Submittal requirements for 40 CFR 64.4**

- 2.26.1 Within six months of the permit issuance, the permittee shall conduct performance test to demonstrate compliance with Permit Condition 2.20, and to develop operating values (i.e., minimum values) for the packed bed scrubber liquid pH and scrubber liquid flow in gallon per minute (gpm), as required in Table 2.2.

**[DRAFT]**

- 2.26.2 Performance test(s) shall be conducted in accordance with General Provision 6 and 40 CFR 60 Appendix A, Methods 1 through 4 and Method 6, or DEQ approved alternatives.

**[DRAFT, August 29, 1997]**

- 2.26.3 The permittee shall submit a test protocol for each performance test required by this permit condition to DEQ for approval at least 30 days prior to each test date. Each performance test report, including the required process data, shall be submitted to the DEQ within 30 days of the date on which the performance test is conducted.

**[August 29, 1997]**

- 2.26.4 As discussed in 40 CFR 64.4(c)(1), performance test(s) generally shall be conducted under conditions representative of maximum emissions potential under anticipated operating conditions of LVHC system



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(i.e., when LVHC gases are being generated from 12 batch digesters “blows”, No.1 and No.2 M&D continuous digesters, multiple-effect evaporator system, turpentine system, and foul condensate collection tank.) Such data may be supplemented, if desired, by engineering assessments and manufacturer's recommendations to justify the indicator ranges (or, if applicable, the procedures for establishing such indicator ranges). Emission testing is not required to be conducted over the entire indicator range or range of potential emissions.

**[DRAFT, 40 CFR 64.4(c)(1)]**

2.26.5 The permittee shall record the operating data of the control system parameters specified in the following when conducting any performance testing.

- i) The scrubber liquid flow in gallon per minute.
- ii) Scrubber liquid pH.
- iii) Pulp production rate in air dried ton unbleached pulp per hour (ADTUBP/hr).

**[DRAFT]**

2.26.6 Performance Test Frequency

- The permittee shall conduct performance test to re-evaluate the values of the indicators specified in Table 2.2, and to demonstrate compliance with SO<sub>2</sub> emissions limits specified in Permit Condition 2.20 at least every five years.
- If the SO<sub>2</sub> emissions measured during the performance test is greater than 75%, but less than or equal to 90% of SO<sub>2</sub> emissions limits specified in Permit Condition 2.20, the next performance test shall be conducted within three years of that performance test date.
- If the SO<sub>2</sub> emissions measured during the performance test is greater than 90% of SO<sub>2</sub> emissions limits specified in Permit Condition 2.20, the permittee shall conduct a compliance test annually.

**[DRAFT]**

### **2.27 Approved Monitoring Requirements in Accordance with 40 CFR 64.6**

2.27.1 The regulatory deadline for starting using approved monitoring requirements in Permit Condition 2.27.2 is defined in 40 CFR 64.7(a). The permittee may start using approved monitoring requirements prior to the regulatory deadline as specified in Permit Condition 2.23.

2.27.2 The permittee shall comply with the following approved monitoring requirements for the SO<sub>2</sub> packed bed scrubber.

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**Table 2.2 MONITORING REQUIREMENT FOR THE SO<sub>2</sub> PACKED BED SCRUBBER**

	Indicator No.1	Indicator No.2
I. Indicator Measurement Approach	Scrubber liquid pH The scrubber liquid pH is measured using a pH sensor.	Scrubber liquid flow The scrubber liquid flow is measured using a magnetic flow tube element.
II. Indicator Range	An excursion is defined as a scrubber pH value, as a three-hour block average, less than the values developed under Permit Condition 2.26. An excursion shall trigger an inspection, corrective action as necessary, and a reporting requirement.	An excursion is defined as a scrubber liquid flow value (gpm), as a three-hour block average, less than the values developed under Permit Condition 2.26. An excursion shall trigger an inspection, corrective action as necessary, and a reporting requirement.
III. Performance Criteria		
A. Data Representativeness	The scrubber liquid pH sensor is located in the scrubber liquid recirculation line.	The scrubber liquid flow sensor is located on the scrubber liquid recirculation line.
B. Verification of Operational Status	Calibration of the pH sensor conducted by comparison with laboratory measurements of the scrubber recirculation fluid or laboratory standards.	Factory calibration of the magnetic flow tube element before installation. Check the unit when installed to verify correct electrical output.
C. QA/QC Practices and Criteria	Monitoring equipment and process downtime is recorded in a log. The pH meter is checked for accuracy ( $\pm 0.2$ pH units) monthly. The pH sensor is calibrated annually according to the quality assurance plan, which takes into account the manufacturer's specifications for equipment accuracy.	Monitoring equipment and process downtime is recorded in a log. The flow sensor is calibrated annually according to the quality assurance manufacturer's specifications for plan, which takes into account the equipment accuracy.
D. Monitoring Frequency	The scrubber liquid pH is measured continuously.	The scrubber liquid flow is measured continuously.
Data Collection Procedures	The computer records scrubber liquid pH once per hour on the scrubber operating log.	The computer records scrubber liquid flow once per hour on the scrubber operating log.
Averaging period	Three-hour block average	Three-hour block average

[DRAFT]

### 2.28 40 CFR 64.7 - Operation of Approved Monitoring

(a) *Commencement of operation.* The owner or operator shall conduct the monitoring required under this part (i.e., 40 CFR 64) upon issuance of a part 70 or 71 permit (i.e., Tier I OP renewal) that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d)

(b) *Proper maintenance.* At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(c) *Continued operation.* Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator

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shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(d) *Response to excursions or exceedances.* (1) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(e) *Documentation of need for improved monitoring.* After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit (i.e., Tier I OP) to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[DRAFT, 40 CFR 64.7]

### 2.29 40 CFR 64.8 -Quality Improvement Plan (QIP) Requirements

The permittee shall comply with QIP requirements if they are required in accordance with 40 CFR 64.8.

[DRAFT, 40 CFR 64.8]

### 2.30 40 CFR 64.9 -Reporting and Recordkeeping Requirements

(a) *General reporting requirements.* (1) On and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part (i.e., 40 CFR 64) the owner or operator shall submit monitoring reports to the permitting authority in accordance with 40 CFR 70.6(a)(3)(iii).

(2) A report for monitoring under this part (i.e., 40 CFR 64) shall include, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the following information, as applicable:

(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

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(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(iii) A description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(b) *General recordkeeping requirements.* (1) The owner or operator shall comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

**[DRAFT, 40 CFR 64.9]**

**2.31 SO<sub>2</sub> CEMS**

The permittee shall install, calibrate, maintain and operate a continuous emissions rate monitoring system (CEMS) to monitor and record the rate of SO<sub>2</sub> emissions to the atmosphere from the incinerator/packed bed scrubber stack. The span value for the SO<sub>2</sub> concentration monitor portion of the SO<sub>2</sub> CEMS shall be 300 ppm, or a DEQ-approved alternative value. The SO<sub>2</sub> CEMS shall be used directly for determining compliance with SO<sub>2</sub> emission rates listed in Permit Condition 2.19.

- 2.31.1. The installation and initial performance evaluation of the SO<sub>2</sub> CEMS shall be done in accordance with 40 CFR 60, Appendix B, Performance Specification 2, and 40 CFR 60, Appendix B, Performance Specification 6. The permittee shall conduct the initial performance evaluation of the SO<sub>2</sub> CEMS during the performance test, or within 30 days thereafter (i.e., by February 28, 1998 per Permit Conditions 3.3.1, 3.2, and General Provisions F of the to be replaced PTC, issued August 29, 1997).
- 2.31.2 The quality assurance requirements specified in 40 CFR 60, Appendix F are hereby required to be applicable to the SO<sub>2</sub> CEMS.
- 2.31.3 The SO<sub>2</sub> CEMS shall be in continuous operation except for system breakdowns, repairs, calibration checks and zero and span adjustments. In addition, CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.
- 2.31.4 The permittee shall maintain a file containing measurement data and related information for the SO<sub>2</sub> CEMS including, but not limited to, all CEMS output data, copies of all performance evaluation reports, daily calibration drift check data, written quality control procedures, documentation of all adjustments and maintenance on the CEMS, and copies of all information required to be submitted to the DEQ regarding the CEMS. The contents of the files shall be recorded in a permanent form suitable for inspection and shall be retained at the facility for at least five years following the date on which such

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data or information were recorded. Each file shall be made available to DEQ representatives upon request, and shall be used to determine when the LVHC gases are combusted in the incinerator.

[August 29, 1997]

## ***Reporting Requirements***

### **2.32 Relative Accuracy (RA) and Relative Accuracy Test Audit (RATA) Test Protocols**

Test protocols shall be submitted for the initial relative accuracy (RA) test and the first annual relative accuracy test audit (RATA) for the SO<sub>2</sub> CEMS required in Permit Condition 2.31 for DEQ approval at least 30 days prior to the test date. For each subsequent annual RATA for the SO<sub>2</sub> CEMS required in Permit Condition 2.31, the permittee shall submit a notification to the DEQ in writing at least 30 days prior to the test date that states the date when the test will occur and identifies which approved protocol will be used for the test. New test protocols shall be submitted for DEQ approval for any annual RATA after any changes are made to the process at least 30 days prior to the test date for the SO<sub>2</sub> CEMS required in Permit Conditions 2.31.

[August 29, 1997]

### **2.33 RA and RATA Test Reports**

The reporting requirements specified in 40 CFR 60, Appendix B, Performance Specification 2, Section 9, and 40 CFR 60, Appendix B, Performance Specification 3, Section 1.1, and 40 CFR 60, Appendix B, Performance Specification 5, Section 1.1, and 40 CFR 60, Appendix B, Performance Specification 6, Section 1.1, and 40 CFR 60, Appendix F, Section 7, shall be submitted to the DEQ within 30 days of the date on which the corresponding RA test or RATA is completed.

[August 29, 1997]

### **2.34 Quality Control Procedures**

The permittee shall submit to the DEQ copies of the written quality control procedures, specified in 40 CFR 60, Appendix F, Section 3, for the SO<sub>2</sub> CEMS at least 30 days prior to the date of the respective initial RA test.

[August 29, 1997]

### **2.35 SO<sub>2</sub> Excess Emissions Reports**

The permittee shall submit to the DEQ excess emissions and monitoring systems performance reports and/or summary reports for the SO<sub>2</sub> CEMS. The reporting requirements and report format shall comply with 43 CFR 60.7(b) through (d) and IDAPA 16.01.01.131. Excess SO<sub>2</sub> emissions are defined as SO<sub>2</sub> emissions with a three-hour block average pound-per-hour (lb/hr) value greater than the pound-per-hour (lb/hr) emission limit listed in Permit Condition 2.20.

[DRAFT, August 29, 1997]

### **2.36 Annual SO<sub>2</sub> Report**

The permittee shall submit an annual report based on a calendar year listing the tons of SO<sub>2</sub> that emitted from the incinerator/scrubber stack for the year. The report is due by January 30 of each year, and may be included as part of the fourth quarter report, or as part of semiannual report.

[DRAFT, August 29, 1997]

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### **3. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

#### ***General Compliance***

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.  
**[Idaho Code §39-101, et seq.]**
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.  
**[IDAPA 58.01.01.211, 5/1/94]**
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.  
**[IDAPA 58.01.01.212.01, 5/1/94]**

#### ***Inspection and Entry***

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.**[Idaho Code §39-108]**

#### ***Construction and Operation Notification***

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
  - a. A notification of the date of initiation of construction, within five working days after occurrence;

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- b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than 30 days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

**[IDAPA 58.01.01.211, 5/1/94]**

***Performance Testing***

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

**[IDAPA 58.01.01.157, 4/5/00]**

***Monitoring and Recordkeeping***

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

**[IDAPA 58.01.01.211, 5/1/94]**

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060209**

<b>Permittee:</b>	Potlatch Forest Products Corp., Idaho Pulp and Paperboard Division, Lewiston facility	<b>Facility ID No. 069-00001</b>
<b>Location:</b>	Lewiston, Idaho	

***Excess Emissions***

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

**[IDAPA 58.01.01.130-136, 4/5/00]**

***Certification***

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

**[IDAPA 58.01.01.123, 5/1/94]**

***False Statements***

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

**[IDAPA 58.01.01.125, 3/23/98]**

***Tampering***

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

**[IDAPA 58.01.01.126, 3/23/98]**

***Transferability***

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

**[IDAPA 58.01.01.209.06, 4/11/06]**

***Severability***

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.